

Exhibit 154

Redacted Public Version

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NIKE, INC.,)
Plaintiff,)
)
)
vs.) Case No. :
) 1:22-cv-00983-VEC
STOCKX LLC,)
Defendant.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY
VIDEO-RECORDED 30(b)(6) DEPOSITION OF
HEATHER PAULSON
Portland, Oregon
Friday, January 6, 2023; 9:11 a.m.

REPORTED BY:
Victoria A. Guerrero, CSR, RPR, CRR
Job No. 5593361
Pages 1 through 291

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

<div>Page 2</div> <div>1IN THE UNITED STATES DISTRICT COURT</div> <div>2FOR THE SOUTHERN DISTRICT OF NEW YORK</div> <div>3</div> <div>4NIKE, INC.,)</div> <div>Plaintiff,)</div> <div>5)</div> <div>6vs.) Case No.:</div> <div>) 1:22-cv-00983-VEC</div> <div>7STOCKX LLC,)</div> <div>Defendant.)</div> <div>8_____)</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16BE IT REMEMBERED that, pursuant to Federal</div> <div>17Rules of Civil Procedure, the 30(b)(6) deposition of</div> <div>18HEATHER PAULSON taken on behalf of the Defendant was</div> <div>19taken before Victoria A. Guerrero, Certified</div> <div>20Shorthand Reporter, Registered Diplomat Reporter,</div> <div>21Registered Merit Reporter, and Certified Realtime</div> <div>22Reporter, on Friday, January 6, 2023, commencing at</div> <div>23the hour of 9:11 a.m., at Stoel Rives LLP, 760 SW</div> <div>24Ninth Avenue, Suite 3000, in the City of Portland,</div> <div>25County of Multnomah, State of Oregon.</div>	<div>Page 4</div> <div>1INDEX TO EXAMINATION</div> <div>2WITNESS: HEATHER PAULSON</div> <div>3</div> <div>4EXAMINATION: PAGE LINE</div> <div>By Mr. Ford 9 9</div> <div>5</div> <div>6* * *</div> <div>7</div> <div>8</div> <div>9</div> <div>10</div> <div>11</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>Page 3</div> <div>1A P P E A R A N C E S:</div> <div>2</div> <div>3FOR THE PLAINTIFF:</div> <div>4DLA PIPER LLP</div> <div>MARC MILLER</div> <div>51251 Avenue of the Americas</div> <div>New York, New York 10020</div> <div>6P 212.335.4964 F 212.884.8464</div> <div>marc.miller@dlapiper.com</div> <div>7</div> <div>8</div> <div>9FOR THE DEFENDANT:</div> <div>10DEBEVOISE & PLIMPTON LLP</div> <div>CHRISTOPHER S. FORD</div> <div>11919 Third Avenue</div> <div>New York, New York 10022</div> <div>12csford@debevoise.com</div> <div>13</div> <div>14DEBEVOISE & PLIMPTON LLP</div> <div>KATE SABA</div> <div>650 California Street</div> <div>15San Francisco, California 94108</div> <div>ksaba@debevoise.com</div> <div>16</div> <div>17</div> <div>18ALSO PRESENT:</div> <div>19Kimberly Van Voorhis, Nike Assistant General Counsel</div> <div>20Mick Irwin, Videographer</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>Page 5</div> <div>1INDEX TO EXHIBITS</div> <div>2HEATHER PAULSON</div> <div>3Nike vs. StockX</div> <div>4Friday, January 6, 2023</div> <div>5Victoria A. Guerrero, CSR, RPR, RMR, CRR</div> <div>6</div> <div>7MARKED DESCRIPTION PAGE LINE</div> <div>Exhibit 1 Notice of Deposition of Nike, 14 17</div> <div>Inc. (No Bates)</div> <div>8</div> <div>Exhibit 2 Plaintiff Nike, Inc.'s 15 1</div> <div>Objections and Responses to</div> <div>StockX LLC's Rule 30(b)(6)</div> <div>Deposition Notice (No Bates)</div> <div>10Exhibit 3 email chain with attachment re 113 10</div> <div>NIKE0035610</div> <div>13Exhibit 4 Attachment to Exhibit 3, slide 113 13</div> <div>deck titled Feb 2019;</div> <div>NIKE0035611 through 35650</div> <div>15Exhibit 5 Email chain re StockX; 182 3</div> <div>NIKE0037904 and 37905</div> <div>16</div> <div>Exhibit 6 Email with attachment re 202 6</div> <div>NIKE0036668</div> <div>18</div> <div>Exhibit 7 Attachment to Exhibit 6, Slide 202 9</div> <div>deck titled</div> <div>April 2019;</div> <div>NIKE0036670 through 36733</div> <div>21</div> <div>Exhibit 8 Email chain with attachment re 230 1</div> <div>Pre-read:</div> <div>Brainstorm;</div> <div>NIKE0037338</div> <div>23</div> <div>24</div> <div>25(EXHIBITS CONTINUE NEXT PAGE.)</div>

2 (Pages 2 - 5)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

<p style="text-align: right;">Page 74</p> <p>1 MR. MILLER: Objection to form.</p> <p>2 THE WITNESS: I think that was a little</p> <p>3 bit [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 BY MR. FORD:</p> <p>10 Q I see. [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 MR. MILLER: Objection to form.</p> <p>14 THE WITNESS: [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 BY MR. FORD:</p> <p>19 Q Sure. [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 76</p> <p>1 [REDACTED]</p> <p>2 MR. MILLER: Objection to form.</p> <p>3 THE WITNESS: I don't know. The data</p> <p>4 scientists did that.</p> <p>5 BY MR. FORD:</p> <p>6 Q That's totally fine. I just wanted to</p> <p>7 understand.</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 Q What is Valiant Labs?</p> <p>14 MR. MILLER: Objection to form.</p> <p>15 THE WITNESS: Valiant Labs is an</p> <p>16 innovation accelerator within Nike who looks</p> <p>17 for new business opportunities for us.</p> <p>18 BY MR. FORD:</p> <p>19 Q And was Valiant Labs acquired by Nike or</p> <p>20 was it just the name of a group that was created</p> <p>21 within Nike?</p> <p>22 MR. MILLER: Objection to form.</p> <p>23 THE WITNESS: The name of a group that was</p> <p>24 created within Nike.</p> <p>25 ///</p>
<p style="text-align: right;">Page 75</p> <p>1 [REDACTED]</p> <p>2 MR. MILLER: Objection to form.</p> <p>3 THE WITNESS: [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 BY MR. FORD:</p> <p>7 Q Got it. [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 MR. MILLER: Objection to form.</p> <p>12 THE WITNESS: [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 77</p> <p>1 BY MR. FORD:</p> <p>2 Q And do you know when Valiant Labs was</p> <p>3 created?</p> <p>4 A No.</p> <p>5 Q When, during your time at Nike, did you</p> <p>6 first work with Valiant Labs?</p> <p>7 MR. MILLER: Objection to form.</p> <p>8 THE WITNESS: That's a good question.</p> <p>9 Long time ago.</p> <p>10 BY MR. FORD:</p> <p>11 Q So they've been around for a long time?</p> <p>12 A They've been around for a long time.</p> <p>13 Q [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

20 (Pages 74 - 77)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

Page 78

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 A Isaiah was the entrepreneur in residence
13 who led the project.
14 Q And that's Isaiah Steinfeld?
15 A Yes.
16 Q Do you know when the [REDACTED] project began?
17 A Yes. In 2017.
18 Q And when you describe [REDACTED]

12 A Isaiah was the entrepreneur in residence
13 who led the project.

14 Q And that's Isaiah Steinfeld?

15 A Yes.

16 Q Do you know when the [REDACTED] project began?

17 A Yes. In 2017.

18 Q And when you describe [REDACTED]
[REDACTED] what does that mean?

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

Page 79

[illegible]

22 Q And is Mr. Steinfeld still a Nike employee?

23 A No.

24 Q When did he leave the company?

25 A I don't know.

Page 80

1 Q Do you know why he left the company?
2 A I don't.
3 Q When was the last time you spoke to
4 Mr. Steinfeld, if you recall?
5 A I don't recall. He sent me a good-bye
6 email, but I don't recall.
7 Q Do you know where he went after leaving
8 Nike?
9 A To a start-up.
10 Q Do you know the name?
11 A No.
12 Q And haven't spoken to him since the
13 good-bye email?
14 A No.
15 Q So why was it important -- sorry.
16 Withdrawn. Let me start that again.

[illegible]

Page 81

[illegible]

Page 84

[illegible][illegible]

Page 85

[illegible][illegible]

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

<p style="text-align: right;">Page 86</p> <p>1 THE WITNESS: As such, the [REDACTED] team</p> <p>2 moved on to something else. Different things.</p> <p>3 BY MR. FORD:</p> <p>4 Q When you say they moved on to something</p> <p>5 else, did they move on to the same project under a</p> <p>6 different name or the team scattered to different</p> <p>7 unrelated projects?</p> <p>8 MR. MILLER: Objection to form.</p> <p>9 THE WITNESS: It was not the same project</p> <p>10 under a different name and the team ended up in</p> <p>11 different places.</p> <p>12 BY MR. FORD:</p> <p>13 Q Why did Nike shut down the [REDACTED] program?</p> <p>14 MR. MILLER: Objection to form.</p> <p>15 THE WITNESS: Actually, I don't have the</p> <p>16 details on that. I don't know why we moved</p> <p>17 away -- I don't know why we moved away from the</p> <p>18 [REDACTED] program.</p> <p>19 BY MR. FORD:</p> <p>20 Q Do you know who would know?</p> <p>21 A Isaiah.</p> <p>22 Q Did Isaiah make the decision to shut down</p> <p>23 the [REDACTED] program or was it a direction from someone</p> <p>24 more senior in the company?</p> <p>25 MR. MILLER: Objection to form.</p>	<p style="text-align: right;">Page 88</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 BY MR. FORD:</p> <p>6 Q Just for the record, what's Hannah's last</p> <p>7 name?</p> <p>8 A Jones.</p> <p>9 Q And did Hannah report to Isaiah?</p> <p>10 A No. She led all of Valiant across --</p> <p>11 across the entrepreneurs and residents.</p> <p>12 Q I see. So was it vice versa, Isaiah</p> <p>13 reported up to Hannah?</p> <p>14 MR. MILLER: Objection to form.</p> <p>15 THE WITNESS: Reported to someone up to</p> <p>16 Hannah.</p> <p>17 BY MR. FORD:</p> <p>18 Q Is Hannah still with Nike?</p> <p>19 A No.</p> <p>20 Q Do you know when she left the company?</p> <p>21 A No.</p> <p>22 Q So other than Hannah, are you aware of</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 MR. MILLER: Objection to form.</p>
<p style="text-align: right;">Page 87</p> <p>1 THE WITNESS: I don't know.</p> <p>2 BY MR. FORD:</p> <p>3 Q Other than Isaiah, is there anyone who</p> <p>4 might know why Nike moved away from the [REDACTED]</p> <p>5 program?</p> <p>6 MR. MILLER: Objection to form.</p> <p>7 THE WITNESS: The Brand Protection team</p> <p>8 might.</p> <p>9 BY MR. FORD:</p> <p>10 Q And that's Mr. Pallets' team, Joe Pallets'</p> <p>11 team?</p> <p>12 MR. MILLER: Objection to form.</p> <p>13 THE WITNESS: I don't know. Probably.</p> <p>14 He's on that team.</p> <p>15 BY MR. FORD:</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 MR. MILLER: Objection to form.</p> <p>20 THE WITNESS: "Need approval." The</p> <p>21 Valiant team, when they're doing things that</p> <p>22 aren't consumer-facing with the brand, is</p> <p>23 generally empowered to move forward. They test</p> <p>24 a lot of things. And they shut down a lot of</p> <p>25 things or shift or rebrand a lot of things.</p>	<p style="text-align: right;">Page 89</p> <p>1 MR. FORD: Sorry. Let me rephrase the</p> <p>2 question.</p> <p>3 BY MR. FORD:</p> <p>4 Q Do you know who within Nike gave approval</p> <p>5 for Valiant Labs to [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 A No.</p> <p>8 Q Do you know who would know the answer to</p> <p>9 that question?</p> <p>10 MR. MILLER: Objection to form.</p> <p>11 THE WITNESS: No.</p> <p>12 BY MR. FORD:</p> <p>13 Q [REDACTED]</p> <p>14 which we'll get to, what did Valiant Labs do to</p> <p>15 develop the [REDACTED] project?</p> <p>16 MR. MILLER: Objection to form.</p> <p>17 THE WITNESS: [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 BY MR. FORD:</p> <p>25 Q So take those in turn, what is the</p>


23 (Pages 86 - 89)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

<p style="text-align: right;">Page 262</p> <p>1 [REDACTED] We were not piloting that in any way.</p> <p>2 So it seems like a generous heading.</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 A I think that was the intent, was to do that</p> <p>8 before we defunded that program. [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 Q Okay. And then if you look on some of the</p> <p>16 subsequent slides, I see, you know, for example,</p> <p>17 slide 18, slide 19, there's a couple blue boxes that</p> <p>18 seem to be instructions about editing; is that</p> <p>19 right?</p> <p>20 A Yes. That's why it looks like it's the</p> <p>21 current work in progress version that Daniel was</p> <p>22 going to take to DJ's one-on-one. He wouldn't have</p> <p>23 brought that to an executive audience. So it was</p> <p>24 notes on how to improve the screen shots for the</p> <p>25 deck.</p>	<p style="text-align: right;">Page 264</p> <p>1 October -- China started shutting down, right?</p> <p>2 I mean, it was months later.</p> <p>3 BY MR. FORD:</p> <p>4 Q Of 2019?</p> <p>5 A Of 2019. So sometime in that time frame it</p> <p>6 was decided that this wasn't a priority anymore.</p> <p>7 Q And why did Nike -- why did Nike decide</p> <p>8 that this wasn't a priority anymore?</p> <p>9 MR. MILLER: Objection to form.</p> <p>10 THE WITNESS: I think it's just a</p> <p>11 combination of as you go through budgeting</p> <p>12 iterations and look at other opportunities, it</p> <p>13 fell off the list.</p> <p>14 BY MR. FORD:</p> <p>15 Q Did Nike -- sorry. Let me rephrase that.</p> <p>16 What is Nike's -- sorry. Let me start</p> <p>17 again.</p> <p>18 Does Nike have an annual or periodic</p> <p>19 budgeting process?</p> <p>20 MR. MILLER: Objection to form.</p> <p>21 THE WITNESS: Yes. Both.</p> <p>22 BY MR. FORD:</p> <p>23 Q What is the sort of periods during which</p> <p>24 Nike goes through budgeting?</p> <p>25 MR. MILLER: Objection to form.</p>
<p style="text-align: right;">Page 263</p> <p>1 Q So there would have been a final version of</p> <p>2 this deck where these comments would have been</p> <p>3 resolved and removed?</p> <p>4 MR. MILLER: Objection to form.</p> <p>5 THE WITNESS: Yes. There should have been</p> <p>6 a final version of this deck. Although, at</p> <p>7 some point, as I said, we decided to move away</p> <p>8 from this. But I don't -- I don't remember</p> <p>9 when that was.</p> <p>10 BY MR. FORD:</p> <p>11 Q [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 A No.</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 MR. MILLER: Objection to form.</p> <p>24 THE WITNESS: Pre-COVID. So sometime</p> <p>25 between May and, you know, September,</p>	<p style="text-align: right;">Page 265</p> <p>1 THE WITNESS: It feels like constantly.</p> <p>2 Our fiscal year is June through May. [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]?</p> <p>21 MR. MILLER: Objection to form.</p> <p>22 THE WITNESS: Decision, to me, is</p> <p>23 executive team says this is not strategically</p> <p>24 aligned. That's a decision. This isn't quite</p> <p>25 like that. This is an, oh, it's interesting,</p>

67 (Pages 262 - 265)

HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY

<p style="text-align: right;">Page 286</p> <p>1 Q And when -- during what time periods did</p> <p>2 you make those purchases on Farfetch?</p> <p>3 A The past -- over the past three years, up</p> <p>4 until I have something in my cart right now.</p> <p>5 Q Okay. Why don't we take a break. I might</p> <p>6 be done, but I want to just have a chance to talk.</p> <p>7 You can go buy those shoes on Farfetch if you want.</p> <p>8 THE VIDEOGRAPHER: Off the record. It's</p> <p>9 5:00.</p> <p>10 (Off the record.)</p> <p>11 THE VIDEOGRAPHER: It's 5:13. We are back</p> <p>12 on the record.</p> <p>13 MR. FORD: Ms. Paulson, thank you for your</p> <p>14 time today. I don't have any further questions</p> <p>15 for you at the moment.</p> <p>16 I do want to note for the record that we</p> <p>17 have a few concerns about 30(b)(6) preparation</p> <p>18 and document production based on Ms. Paulson's</p> <p>19 testimony today which we'll raise with counsel.</p> <p>20 And so we're not going to conclude the</p> <p>21 deposition until those concerns are resolved.</p> <p>22 But with that, I have nothing further today.</p> <p>23 MR. MILLER: What are your concerns? Can</p> <p>24 you articulate them?</p> <p>25 MR. FORD: Sure. So Ms. Paulson testified</p>	<p style="text-align: right;">Page 288</p> <p>1 REPORTER'S CERTIFICATE</p> <p>2 I, VICTORIA A. GUERRERO, Oregon Certified Shorthand</p> <p>3 Reporter, Registered Diplomat Reporter, Registered Merit</p> <p>4 Reporter, Certified Realtime Reporter, do hereby certify</p> <p>5 that, pursuant to Federal Rules of Civil Procedure, HEATHER</p> <p>6 PAULSON appeared before me at the time and place mentioned</p> <p>7 in the caption herein; that the witness was, by me, first</p> <p>8 duly sworn/affirmed under oath and examined upon oral</p> <p>9 interrogatories propounded by counsel;</p> <p>10 that said examination together with the testimony of</p> <p>11 said witness was taken down by me in stenotype and</p> <p>12 transcribed through computer-aided transcription; I further</p> <p>13 certify that I am not a relative or employee of any attorney</p> <p>14 of the parties, nor financially interested in the action;</p> <p>15 and the foregoing transcript, pages 1 through 287,</p> <p>16 review requested by the witness or a party, constitutes a</p> <p>17 full, true, and correct record of such testimony adduced and</p> <p>18 oral proceedings had and of the whole thereof.</p> <p>19 WITNESS MY HAND AND DIGITAL SIGNATURE this Tuesday,</p> <p>20 January 10, 2023.</p> <p>21 </p> <p>22</p> <p>23 Victoria A. Guerrero, CSR, RDR, RMR, CRR</p> <p>24 Oregon CSR No. 14-0428 (exp. 6-30-2023)</p> <p>25 Washington CCR No. 3293 (exp. 3-15-2023)</p> <p>California CSR No. 8370 (exp. 3-15-2023)</p> <p>Hawaii CSR No. 490 (exp. 12-31-2023)</p>
<p style="text-align: right;">Page 287</p> <p>1 repeatedly that there were aspects of</p> <p>2 presentations that she was unable to explain</p> <p>3 that were plainly within the scope of the</p> <p>4 30(b)(6) topic.</p> <p>5 She spoke to individuals who would have</p> <p>6 had knowledge as to the content of those</p> <p>7 presentations and did not get that knowledge</p> <p>8 and information from those individuals in</p> <p>9 advance of her deposition.</p> <p>10 MR. MILLER: Well, I strongly disagree</p> <p>11 with that. I think Ms. Paulson was well</p> <p>12 prepared, spoke with the individuals at the</p> <p>13 company that had the relevant information.</p> <p>14 And if it's your position she couldn't</p> <p>15 answer a single question about a single bullet</p> <p>16 on a single slide, I think that's totally</p> <p>17 unreasonable and not at all deficient, but I</p> <p>18 suppose we'll take it up when you want to raise</p> <p>19 it. We certainly consider this deposition to</p> <p>20 be closed and we'll go from there.</p> <p>21 MR. FORD: Okay. We're off the record.</p> <p>22 THE VIDEOGRAPHER: Off the record at</p> <p>23 5:15 p.m.</p> <p>24 (Proceedings ended at 5:15 p.m.)</p> <p>25 (Signature reserved.)</p>	<p style="text-align: right;">Page 289</p> <p>1 MARC MILLER</p> <p>2 marc.miller@dlapiper.com</p> <p>3 January 11, 2023</p> <p>4 RE: Nike, Inc. v. Stockx LLC</p> <p>5 1/6/2023, Heather Paulson (#5593361)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 cs-ny@veritext.com.</p> <p>16</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>